

FILED

OCT 23 2015

IN THE COUNTY COURT OF LEE COUNTY, MISSISSIPPI

ROSIE DOUGLAS

DAVID DREWING CLERK
BY *[Signature]* Deputy
PLAINTIFF

VS.

CAUSE NO. CV2015-000842

WAL-MART STORES EAST, LP

DEFENDANT

COMPLAINT

JURY TRIAL DEMANDED

COMES NOW THE Plaintiff, Rosie Douglas, and files this her Complaint against the Defendant, Wal-Mart Stores East, LP, and would show unto this Court the following:

I.

That Plaintiff is an adult resident citizen of 901 Mercer Street, Tupelo, MS 38804.

II.

That Defendant is a corporation with its principal place of business at 702 SW 8th Street, Bentonville, Arkansas 72716-8611 but doing business in the State of Mississippi and may be served with process with its Registered Agent: CT Corporation System, at their address of 645 Lakeland East Drive, Suite 101, Flowood, Mississippi 39121.

III.

On October 6, 2012, Plaintiff, Rosie Douglas, (hereinafter Plaintiff) was a patron of Wal-Mart Stores East, LP, (hereinafter Defendant) at the Defendant's place of business located at 3929 North Gloster Street, Tupelo, Mississippi 38804.

IV.

Plaintiff was shopping with her son at or near the electronics middle aisle of Wal-Mart Stores East, LP when she was about to walk down the electronics aisle and slipped on water.

EXHIBIT "A"

Plaintiff's left foot went out in front of her and the right foot went backwards causing injury to her left leg, left hip and right knee. Plaintiff's son caught her before she fell completely to the floor. A supervisor was in the area and advised Plaintiff that he did not know how she could tell that there was water on the floor that the entire floor was shining and it all looked the same. He advised other employees in the store to bring Plaintiff a wheelchair and asked if she wanted an ambulance, which she said she would get her son to take her to the emergency room

V.

The Defendant knew, or should have known, that the store was crowded and water on the floor would be hazardous to the public.

VI.

Defendant negligently failed to have the correct supervision of the store premises and failed to maintain the store in a safe and proper manner, negligently failed to adequately keep a proper outlook for hazardous conditions on their floor.

VII.

Plaintiff seriously injured her left leg, left hip, and right knee.

VIII.

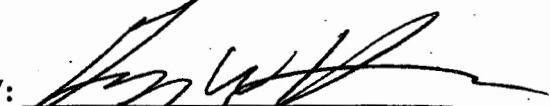
As a proximate result of Defendant's negligence, Plaintiff suffered personal injuries including physical pain, mental pain and suffering, and past and future medical expenses.

WHEREFORE, PREMISES CONSIDERED, Plaintiff sues and demands judgment of and from the Defendant in amount to be determined by the jury for actual and punitive damages and attorney fees and court costs in this matter.

Respectfully submitted this the 23rd day of September, 2015.

ROSIE DOUGLAS, PLAINTIFF

BY:


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MSB#10198

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